

Ackerman, Joyce

From: Dave Folkes <DFolkes@Geosyntec.com>
Sent: Sunday, November 26, 2017 2:33 PM
To: Ackerman, Joyce
Cc: Curtis Stovall - CDPHE; Walker - CDPHE, David; Thomas J. Krasovec; Dave Stewart; Richard Dean
Subject: RE: drill cutting disposal

Joyce, thank you!

From: Ackerman, Joyce [mailto:Ackerman.Joyce@epa.gov]
Sent: Sunday, November 26, 2017 1:41 PM
To: Dave Folkes <DFolkes@Geosyntec.com>
Cc: Curtis Stovall - CDPHE <curtis.stovall@state.co.us>; Walker - CDPHE, David <david.walker@state.co.us>; Thomas J. Krasovec <TJKrasovec@Geosyntec.com>; Dave Stewart <Dave.Stewart@stewartenv.com>; Richard Dean <rdean@stratuscompanies.com>
Subject: Re: drill cutting disposal

Hi Dave - it is okay with EPA to include some of the IDW drums under the AOC. I defer to CDPHE for the other IDW drums.

Joyce

Sent from my iPhone

On Nov 25, 2017, at 3:59 PM, Dave Folkes <DFolkes@Geosyntec.com> wrote:

Hi Joyce, Curt, and Dave,

Stratus would like to dispose of non-hazardous drill cuttings, currently stored on site in the drums we saw, at Front Range landfill. I understand that Curt was previously OK with this, based on the results of soil samples from nearby test pits submitted by Stewart Environmental earlier this year (see below). We are assuming these non-hazardous soils would be managed outside of the AOC. However, we propose managing the cuttings from MW-2 and MW-28, which had high PID levels, along with other contaminated soils during our upcoming removal action under the AOC.

I just want to make sure this approach for managing the drill cuttings is OK with both CDPHE and EPA.

Let me know if either of you would like to discuss this further – otherwise, Stratus would be able to remove and dispose of the non-hazardous drums at Front Range on Monday, pending your approval.

Best, Dave

Parameter

Soil Testing (Quest), Pond Sed

	Quest MW-9 Soil	Pond Sediment Sample	Test Pit 1 - 5 to 6 ft	Test Pit 2 - 5 to 6 ft	Test Pit 3	Test
	16-Apr	22-Feb	17-Jan	17-Jan	17-Jan	
VOC's (Method 8260)						All Va
1,4-Dichlorobenzene	0.015	<1	<0.17	<0.17	No sample - no indiciation of organics	No sar no indici of org
Cis-1,2-DCE	0.016	<1	<0.17	<0.17		
1-1, DCE	ND	<1	<0.17	<0.17		
Isopropylbenzene	ND	<1	<0.17	<0.17		
Isopropytoluene, 4-	ND	<1	<0.17	<0.17		
Trimethylbenzene, 1,2,4-	ND	<1	<0.17	<0.17		
Trimethylbenzene, 1,3,5-	ND	<1	<0.17	<0.17		
2-Butanone (MEK)	ND	<1	30.5	41.7		
butylbenzene, n-	ND	<1	<0.17	<0.17		
Trichloroethylene (TCE)	0.020	<1	0.217	<0.17		
Toluene	ND	<1	0.185	18.6		
Tetrachloroethylene (Perc)	ND	<1	<0.17	<0.17		
Tetrahydrofuran (TFA)	ND	<1	<0.17	<0.17		
Vinyl Chloride	ND	<1	<0.17	<0.17		
Xylenes - Total	ND	<1	<0.17	<0.17		
Remaining VOC's are ND	ND	<1	<0.17	<0.17		

SOC's (Method 8270)						All Valu
1,4 - Dioxane	NA	<8	NA	NA	No Sample - no indiciation of organics	No Sar no indici of org
Benzoic Acid	NA	<80	NA	NA		
Bencyl alcohol	NA	<8	NA	NA		
Bis(2-ethylhexyl) phthalate	NA	<8	NA	NA		
2-Methylphenol	NA	<8	NA	NA		
Pentachlorophenol	NA	4 - J	NA	NA		
Remaining SOC's are ND	NA	<8	NA	NA		

						All
Total Organic Carbon	NA	1.50	NA	NA	NA	

B- Detected between MDL and PQL

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